## Case 1:17-cr-00638-JMF Document 135 Filed 04/25/19 Page 1 of 1





United States Attorney Southern District of New York

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April 25, 2019

## **BY ECF**

The Honorable Jesse M. Furman United States District Judge Thurgood Marshall United States Courthouse 40 Foley Square New York, New York 10007

Re: United States v. Margulies, S2 17 Cr. 638 (JMF)

Dear Judge Furman:

The Government writes, on behalf of the parties, to respectfully submit the following joint proposed schedule for disclosures and motions in advance of the July 16, 2019:

- June 10, 2019: Government expert disclosures and 404(b)
- June 17, 2019: Defense expert disclosures
- June 24, 2019: Government exhibit list and exhibits
- June 24, 2019: Final pretrial submissions (requests to charge, proposed *voir dire*, verdict sheet)
- June 24, 2019: Motions *in limine*; responses due July 1, 2019; replies, if any, due July 8, 2019
- July 1, 2019: Government witness list and materials pursuant to 18 U.S.C. § 3500
- July 8, 2019: Defense witness list, exhibits, and Rule 26.2 materials

Respectfully submitted,

GEOFFREY S. BERMAN United States Attorney Southern District of New York

By: /s/ Negar Tekeei Christine I. Magdo / Negar Tekeei Assistant United States Attorneys Southern District of New York (212) 637-2297 / 2482

cc: Brent Horst, Esq. (via ECF) Counsel for Joel Margulies